

EK/jlp

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously,)	
)	
Plaintiff,)	
)	
vs.)	5:25-cv-00462-G
)	
PLAZA HOTELS, LLC;)	
STEVE KETTER;)	
MICHAEL WILEY;)	
OKC AIRPORT ES, LLC;)	
ESH STRATEGIES FRANCHISE, LLC;)	
KAJAL HOSPITALITY, LLC;)	
JALIYAN HOSPITALITY, INC.;)	
SUPER 8 WORLDWIDE, INC.;)	
CHAND & SAAJ HOSPITALITY, INC.;)	
RAMADA WORLDWIDE, INC.;)	
YASH ENTERPRISES, INC.;)	
HOWARD JOHNSON;)	
INTERNATIONAL, INC.;)	
NOOR HOTEL, LLC;)	
AMBICA, LLC;)	
OM, LLC;)	
INDRA, LLC; and)	
G6 HOSPITALITY FRANCHISING, LLC,)	
)	
Defendants.)	

MOTION TO WITHDRAW OF EMMA C. KINCADE

COMES NOW, Emma C. Kincade, and the law firm of Secrest, Hill, Butler & Secrest, and moves the Court to enter an order allowing her withdrawal as additional counsel for Defendant, Chand & Saaj Hospitality, Inc., pursuant to L.Cv.R. 83.5. In further support of this Motion to Withdraw, Defendant would show the Court as follows:

1. Plaintiff commenced this action in the Oklahoma County District Court on March 19, 2025, Case No. CJ-2025-1850.

2. Defendant Super 8 Worldwide, Inc., Days Inns Worldwide, Inc., Ramada Inn Worldwide, Inc., and Howard Johnson International, Inc., removed this matter to this Court by filing their Notice of Removal on April 23, 2025. [Doc. 1].

3. Emma C. Kincade entered her appearance on behalf of Defendant, Chand & Saaj Hospitality, Inc., on May 27, 2025. [Doc. 48].

4. Emma C. Kincade's last day with the law firm of Secrest, Hill, Butler & Secrest is July 4, 2025.

5. Defendant, Chand & Saaj Hospitality, Inc., is, and will remain, represented by James K. Secrest, III, and Justin Hall, who have entered appearances on its behalf [Docs. 46 & 47].

6. There are no Scheduling Order deadlines.

7. For the Court's convenience and potential use, Emma C. Kincade submits herewith a draft Order Granting the relief requested.

WHEREFORE, premises considered, movant prays the Court grant her Motion to Withdraw, and enter an Order allowing her withdrawal as counsel for Defendant, Chand & Saaj Hospitality, Inc., and that the Court strike Ms. Kincade from all future filing notices.

Respectfully submitted,

SECREST, HILL, BUTLER & SECREST

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CERTIFICATE OF MAILING

This is to certify that on the 27th day of June, 2025, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF Registrants:

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s/ Emma C. Kincade _____